

*Attorneys for Rich Dad Operating Company, LLC,
Pele-Kala Corporation, and BI Capital, LLC*

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FOR THE DISTRICT OF WYOMING

) Case No.: 12-20834
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) Chapter 7
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RDOC'S LISTS OF WITNESSES AND EXHIBITS FOR APRIL 2, 2019 HEARING

Creditor Rich Dad Operating Company, LLC (“RDOC”), pursuant to the Court’s Order dated March 8, 2019 (Doc. 387), hereby submits its lists of anticipated witnesses and proposed exhibits for the April 2, 2019 hearing on the Motion to Approve Settlement of Disputes between the Trustee and Robert Kiyosaki, Kim Kiyosaki, Pele-Kala Corporation, Cashflow Technologies, Inc., BI Capital, LLC, and Rich Dad Operating Company, LLC (Doc. 336) filed by Trustee Tracy L. Zubrod.

RDOC’s List of Anticipated Hearing Witnesses

1. Lynton Kotzin
2. Any witness listed by any other party

RDOC’s List of Proposed Hearing Exhibits¹

1. Statement of Facts in Support of Defendants’ Motion for Partial Summary Judgment re: Breach of Warranty Claims (D. Wyo. Case No. 16cv00217, Docs. 55, 55-1, 55-2)
2. Statement of Facts in Support of Defendants’ Motion for Partial Summary Judgment re: Alter Ego Claim (D. Wyo. Case No. 16cv00217, Doc. 124)
3. Statement of Facts in Support of Defendants’ Motion for Partial Summary Judgment re: Fraudulent Transfer Claims (D. Wyo. Case No. 16cv00217, Doc. 127)
4. McGladrey & Pullen, LLP, Consolidated Financial Report of Cashflow Technologies, Inc. and Related Entities as of December 31, 2008
5. Whitney Information Network, Inc., United States Securities and Exchange Commission Form 10-Q for the quarterly period ended September 30, 2008

¹ Copies of the following are being provided electronically to parties to the hearing.

6. Whitney Information Network, Inc., United States Securities and Exchange Commission Form 10-Q for the quarterly period ended December 31, 2008

7. Tigrent Inc., United States Securities and Exchange Commission Form 10-Q for the quarterly period ended June 30, 2010

8. Tigrent Inc., United States Securities and Exchange Commission Form 10-Q for the quarterly period ended September 30, 2010

Dated: March 26, 2019

Respectfully submitted,

**MARKUS WILLIAMS YOUNG
& ZIMMERMANN LLC**

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CERTIFICATE OF SERVICE

The undersigned certifies that on March 26, 2019, I served by prepaid first-class mail a copy of the attached document on all parties against whom relief is sought and those otherwise entitled to service pursuant to the FED. R. BANKR. P. and the Wyoming LBR at the following addresses:

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